

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Mary Winiarski	:	
700 Cherry Tree Road	:	
Apartment G-3	:	
Aston, Pennsylvania 19014	:	
	:	
Plaintiff	:	CIVIL ACTION NO.: 02-2675
v.	:	
American Airlines, Inc.	:	
4333 Amon Carter Boulevard	:	
Fort Worth, TX 46155	:	
and	:	
AMR Corporation	:	
4333 Amon Carter Boulevard	:	
Fort Worth, TX 46155	:	
and	:	
AMR Eagle Holding Corporation	:	
4333 Amon Carter Boulevard	:	
Fort Worth TX 46155	:	
	:	
Defendants	:	

PLAINTIFF'S PRE-TRIAL DISCLOSURES

A. Plaintiff's Witnesses

WITNESSES PLAINTIFF EXPECTS TO PRESENT:

1. Plaintiff Mary Winiarski
Aston, PA
2. Annmarie Birmingham
Aston, PA
3. Deborah J. Franklin, Ph.D., M.D.
Philadelphia, PA
4. Keith Robinson, M.D.
Philadelphia, PA

5. John E. Gordon, Ph.D.
Philadelphia, PA
6. Donald E. Jennings, Ed.D.
Feasterville, PA
7. David L. Hopkins, ASA, MAAA
Conshohocken, PA

Plaintiff reserves the right to call all witnesses identified by the defendants.

WITNESSES WHOM PLAINTIFF MAY CALL IF NEED ARISES

1. Mark I. Ellen, M.D.
Philadelphia, PA
2. Lee Finkel, D.C.
Aston, PA
3. Bruce H. Grossinger, D.O.
Ridley Park, PA 19078
4. Jennifer Kogan, M.D.
Philadelphia, PA
5. Joan Mollman, M.D.
Philadelphia, PA
6. John S. Rizzo, M.D.
Ridley Park, PA 19078
7. Curtis Slipman, M.D.
Philadelphia, PA
8. John C. Witherell, M.D.
Upland, PA
9. Karen Wyman, P.T.
Aston, PA
10. Flight Attendant Alan Pare
Boston, MA

11. Flight Attendant Marshall Banks
Boston, MA

Plaintiff reserves the right to call all witnesses identified by the defendants.

B. Witnesses To Be Presented By Deposition:

Plaintiff reserves the right to present by videotape trial deposition any experts and/or treating physicians identified by the plaintiff.

C. Documents and Exhibits:

EXHIBITS EXPECTED TO BE OFFERED:

P-1. Plaintiff's medical records, medical bills, radiologic studies and other medical documentation from the following providers:

- a. Mark I. Ellen, M.D.
Hospital of the University of Pennsylvania
Department of Rehabilitation Medicine
Ground Floor White Building
3400 Spruce Street
Philadelphia, PA 19104-4283
- b. Len Finkel, D.C.
221 Pennell Road
Aston, PA 19014
- c. Bruce H. Grossinger, D.O.
Swarthmore Neurology Associates, P.C.
23 Chester Pike, Suite 301
Ridley Park, PA 19078
- d. Jennifer Kogan, M.D.
Hospital of the University of Pennsylvania
Silverstein Bldg., 3rd Floor, Suite "C"
3400 Spruce Street
Philadelphia, PA 19104-4283

- e. Joan Mollman, M.D.
Hospital of the University of Pennsylvania
Silverstein Bldg.
3400 Spruce Street
Philadelphia, PA 19104-4283
- f. John S. Rizzo, M.D.
Starer-Rizzo-Fuffini Ophthalmic Associates, P.C.
Taylor Hospital Medical Building
8 Morton Avenue, Suite 101
Ridley Park, PA 19078
- g. William H. Shull, Jr., M.D.
Hospital of the University of Pennsylvania
Silverstein Bldg./ERDMAN Outpatient Center/Ground White
3400 Spruce Street
Philadelphia, PA 19104-4283
- h. Curtis Slipman, M.D.
3400 Spruce Street
Rehabilitation Hospital
Ground White Building
Philadelphia, PA 19104
- i. John C. Witherell, M.D.
Ophthalmic Surgical Associates, Inc.
Crozer Chester Medical - Professional Office Bldg.
Building 1, Suite 104
1 Medical Center Blvd.
Upland, PA 19013
- j. Karen Wyman, P.T.
Wyman Physical Therapy
419 Marianville Road
Aston, PA 19014
- k. Magee Rehabilitation Hospital
6 Franklin Plaza
Philadelphia, PA 19102
- l. Documentation from any of the other
medical providers of plaintiff

- P-2. A-300 General Procedure Manual identified at the deposition of Flight Attendants;
- P-3. Carry-on Baggage Stow Regulations Identified at Flight Attendant's Deposition;
- P-4. Carry-on Baggage Stow Regulations Identified at Flight Attendant's Deposition;
- P-5. Diagram of A-300;
- P-6. Flight Attendant P.A. Card;
- P-7. Crew list of subject flight;
- P-8. Passenger list of subject flight;
- P-9. Mary Winiarski's airline ticket in connection with subject flight;
- P-10. Person PNR List identified at Flight Attendant's deposition;
- P-11. Event Note identified at Flight Attendant's deposition;
- P-12. Telephone message identified at Flight Attendant's Deposition;
- 13. Flight Attendant Report Request dated September 15, 2000;
- 14. AMR Event Call Center Report prepared by Flight Attendant Alan Pare;
- P-15. AMR Event Call Center Report prepared by Flight Attendant Marshall Banks;
- P-16. All remaining documents produced by defendants in discovery;
- P-17. All exhibits identified by the defendants;
- P-18. Plaintiff's School Records from Garnet Valley High School;
- P-19. Plaintiff's Employment Records from Nordstrom's;
- P-20. Photographs of the plaintiff and family members;
- P-21. Anatomical illustrations and models;
- P-22. Literature in support of plaintiff's claims;

P-23. Defendants' answers to interrogatories and document requests;

P-24. Calendar or summary of events;

P-25. Summary of damages and medical bill summary.

Plaintiff reserves the right to use all exhibits identified by the defendants.

D. Exhibits Which May Be Offered if Need Arises

1. Plaintiff's expert reports and curriculum vitae including all exhibits identified in said expert reports;
2. All exhibits identified during cross-examination and/or rebuttal.

Respectfully submitted,

By: _____
Andrew J. Stern, Esquire
The Beasley Firm
1125 Walnut Street
Philadelphia, PA 19107
(215) 592-1000
Attorney for plaintiff